

Brian Quiros

From: Tisa, Kimberly
Sent: Tuesday, September 27, 2016 3:54 PM
To: Mike Zarba
Cc: Doubleday, Edward; Trombly, Gary; Tisa, Kimberly
Subject: EPA Comments on submitted work plan documents for Century Enterprise Center PCB-related activities

EPA has reviewed the information provided by email dated September 23, 2016. These documents were submitted for EPA review and/or approval in accordance with the conditions of the September 1, 2015 PCB Cleanup and Disposal Approval under 40 CFR §§ 761.61(a) and (c).

In your email of September 23, 2016, you request EPA concurrence to proceed with crane decontamination and exterior soil removal. These activities were contained within EPA's September 1, 2015 Approval. However, EPA is providing comments on the contractor work plan ("CWP") which includes the soil removal and crane decontamination activities.

EPA comments are provided on each document below, for ease of your review.

A. Revised PCB Sampling Plan, Rev. 3 dated September 22, 2016

EPA reviewed this document on September 26, 2016 and subsequently discussed the proposed sampling with Ross Hartman on September 26, 2016. The proposed sampling locations and total number of samples to be collected were not clear. Mr. Hartman indicated that he would discuss with the appropriate parties and submit a revised document clarifying the sampling.

B. PCB Remediation Work Plan, Revision 4 dated September 21, 2016 (CWP - Select Demo)

1. Page 6 of 17. Section 3.1, Item 3. There is reference to former transformer location T-1 and less than 50 ppm. There is soil (and concrete, see Comment 3, below) located at T1 SB-7A to be disposed as a \geq 50 ppm PCB waste (see page 3 of 17).
2. Page 7 of 17. Item 7. Please clarify the sampling proposed here as this references the approved "Modified SICP". Is this sampling proposed in lieu of the sampling that was to be done of the "stockpiled" milled concrete prior to shipment for off-site disposal?
3. Page 7 of 17. Item 11. As indicated in EPA's previous comments, EPA's approval required overlying concrete in the T1 SB-7A area to be disposed as a > 50 ppm PCB waste, unless additional sampling was conducted to support alternative disposal. No sampling data was provided to support an alternative disposal. Please amend CWP for consistency with EPA Approval.
4. Page 8 of 17. Item 16. Milling operations will continue while verification samples are collected. Given this there is potential for re-contamination to milled/sampled areas while milling operations are ongoing. On page 9, Section 4.2. there is reference to dust control measures detailed in section 3.3. This Work Plan contained no such section. EPA did identify discussion of isolation of work areas

and perimeter dust monitoring in Section 8.2 (also stated in Response #8 to EPA comments on CWP). It is not clear what the "perimeter" is in reference to. Please confirm if the perimeter is the work area or if not, please clarify what it refers to. Also, as the milling operations will occur from north to south (see Appendix A of CWP), please confirm that once the PCB cleanup standard of 1 ppm is achieved in a work area, this work area will then be closed to equipment or any activity that could cause re-contamination until remediation work is completed.

5. Pages 10 and 11 of 17. Section 6.0.

- a. 1st paragraph. *PCB remediation waste* must be disposed in accordance with 40 CFR 761.61 and *PCB bulk product waste* must be disposed in accordance with 40 CFR 761.62.
- b. It is indicated that liquid waste will be disposed at Wayne Disposal in Belleville, Michigan. This facility is a land disposal facility and liquids may not be disposed in a landfill. Does this facility have a PCB approval to treat/dispose of PCB-containing liquids or will the liquids be shipped elsewhere for disposal?
- c. EPA is not familiar with Phase III Environmental in Palmerton, PA, which is the proposed disposal facility for < 50 ppm *PCB remediation waste*. Please provide to EPA, a copy of this facility's state disposal permit to accept < 50 ppm PCB waste.
- d. Where will the ≥ 50 ppm PCB-contaminated concrete be disposed of?
- e. Where will decontamination waste solids (e.g., poly, rags, etc) be disposed of?

C. Responses to EPA Comments

1. *Response to EPA Comment 4 on SIP Addendum pertaining to expansion joint caulk/concrete removal.* EPA does not understand the response with respect to the depth of removal. Will more sand be removed prior to verification sampling of the S-4 area where PCB concentrations were > 1 ppm at a depth of 6 inches?
2. *Response to EPA Comment 6 on CWP.* See EPA comment 5.a., above on CWP.
3. *Response to EPA Comment 8 on CWP.* See EPA comment 5.b., above on CWP.

Should you have any questions on the above, please feel free to contact me.

Kimberly N. Tisa, PCB Coordinator
USEPA
5 Post Office Square, Suite 100
Boston, MA 02109-3912

617.918.1527 (phone)
617.918.0527 (fax)
Tisa.Kimberly@epa.gov

From: Mike Zarba [mailto:mzarba@newmilford.org]
Sent: Friday, September 23, 2016 11:19 AM
To: Tisa, Kimberly <Tisa.Kimberly@epa.gov>

Cc: Doubleday, Edward <EDoubleday@trcsolutions.com>; Trombly, Gary <Gary.Trombly@ct.gov>

Subject: Re: Submittal of EPA Work Plan and Associated Documents

Kim:

Please find attached three documents containing responses to your September 15, 2016 e-mails (three) and the additional information referred to below and in support of the answers. The documents included:

1. Written Responses to all three e-mails (in one document)
2. Updated and Revised PCB Remediation Work Plan (Revision 4 dated September 21, 2016) and
3. Updated and Revised PCB Sampling Plan (Rev 3 dated September 22, 2016)
 - o This plan includes the requested photographs in Attachments A & B

I will follow up with the submission of hard copies of all three documents for your records and file. In the meantime we would appreciate you review and approval to proceed with crane decontamination and exterior soil removal to maintain project progress.

Thank You,

Michael F. Zarba, P.E.

Public Works Director

Town of New Milford

(860) 355-6040 ext. 3247 phone

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www.newmilford.org/DPW

On Wed, Sep 14, 2016 at 2:00 PM, Mike Zarba <mzarba@newmilford.org> wrote:

Kim:

First

I believe that we will have the information to you either late this week or by early next week.

Second

Are you available for a conference call with me and TRC Thursday (tomorrow 9/15) morning? If so, please let me know the best time for you.

Third

In the meantime, your authorization is requested to proceed with (only) the Crane Decontamination and exterior soil removal and disposal, per the work plan.

Thank You,

Michael F. Zarba, P.E.

Public Works Director

Town of New Milford

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On Mon, Sep 12, 2016 at 8:06 AM, Tisa, Kimberly <Tisa.Kimberly@epa.gov> wrote:

Thanks. When can I expect the information you indicated below will be provided?

With respect to the Town's response regarding painted surfaces, please be aware that EPA's approvals did not specifically address the paint. Further, no specific information pertaining to PCBs and paint was discussed in any of the documents reviewed. As previously indicated to the Town, the responsibility for ensuring management and disposal of regulated PCBs under 40 CFR Part 761 remains with the Town.

I am also in receipt of a recent court order allowing Standard Demo to collect certain samples for analysis. Please let me know how this effects any work you are currently proposing and/or changes any work at the Site.

Kimberly N. Tisa, PCB Coordinator

USEPA

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[617.918.0527](tel:617.918.0527) (fax)

Tisa.Kimberly@epa.gov

From: Mike Zarba [mailto:mzarba@newmilford.org]

Sent: Friday, September 09, 2016 1:54 PM

To: Tisa, Kimberly <Tisa.Kimberly@epa.gov>

Cc: rhartman@strategic-es.com; Doubleday, Edward <EDoubleday@trcsolutions.com>; Michael Costello <mike@costellodismantling.com>; jcibien@costellodismantling.com

Subject: Re: Submittal of EPA Work Plan and Associated Documents

Hi Kim:

Please see the responses to your questions below (answers are in **red**).

Michael F. Zarba, P.E.

Public Works Director

Town of New Milford

[\(860\) 355-6040](tel:(860)355-6040) **ext. 3247** phone

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On Wed, Aug 31, 2016 at 12:37 PM, Tisa, Kimberly <Tisa.Kimberly@epa.gov> wrote:

Mike:

I wanted to let you know that I spoke with Ross Hartman about the sampling plan. I did this as I had specific technical questions and the August 17, 2016 letter attached to the Town's August 19, 2016 email, indicated that Ross could be contacted for questions. We discussed the following issues:

1. It would be helpful if pictures of the various structure types that will be sampled could be provided.

P

ictures of the various structure types that will be sampled

will be provided

2. It is unclear what, if any, horizontal beams are included in the plan. For this, I reference pictures provided by John Meyer via email dated August 4, 2016, which show horizontal beams throughout the building.

We will resubmit the sampling plan to include the sampling locations associated with the horizontal beams

3. It is unclear what would happen in the event there is an exceedance of the decontamination standard for non-porous surfaces (e.g., metal surfaces). While there is discussion of re-cleaning the exceedance, there is no discussion on how this extends to other similar but not sampled structures.

We will propose additional sampling in the event sampling data results reveal an exceedance.

4. As I mentioned to you earlier, you may recall that I was told about paint on some of the surfaces. There is no mention in this document about paint, e.g., if paint is an issue, where it is, how much is present, etc. If the City believes it is not an issue, then it must be so stated and how this was determined.

The Town of New Milford does not believe that paint is an issue. Our determination is based on 16 years of studies, testing and reports that have been performed on this site and building. The

existence of significant quantities of lead based paints on structural components, including building columns, has been formally identified by the Town in numerous reports submitted to EPA and other regulatory agencies over the years. More specifically we reference the Phase I Source Removal Plan as approved by EPA, Sections 3.5, 4.2.5, 4.4, 5.1 and 5.8 which reference hazardous building materials (including paints on structural steel) and conclude that the source of PCB contamination in the building is dielectric fluid from transformers and overhead cranes. The information and conclusions in that plan, and subsequent follow up phases, were derived from several studies and investigations, some of which are referred to in the Phase I plan, including but not limited to the RCRA Facility Investigation Report (RFI) dated July 31, 2003, Hazardous Materials Surveys dated December 21, 2000 and May 25, 2004, and The EE/CA Building Interior dated May 21, 2004. In addition, the Town's EPA-approved Phase II PCB Remediation Plan provided that painted structural steel was to be handled as a non-porous material. Lastly the 2014 IRAR summarizes work completed in phases I and II which included the decontamination and removal of painted steel surfaces.

Should you have any questions, please feel free to contact me.

Kimberly N. Tisa, PCB Coordinator

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Tisa.Kimberly@epa.gov

From: Mike Zarba [mailto:mzarba@newmilford.org]

Sent: Tuesday, August 30, 2016 3:55 PM

To: Tisa, Kimberly <Tisa.Kimberly@epa.gov>

Subject: Fwd: Submittal of EPA Work Plan and Associated Documents

Kim - sorry - for some reason your e-mail address was truncated in my first attempt.

Thanks,

Michael F. Zarba, P.E.

Public Works Director

Town of New Milford

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----- Forwarded message -----

From: **Mike Zarba** <mzarba@newmilford.org>

Date: Tue, Aug 30, 2016 at 3:50 PM

Subject: Re: Submittal of EPA Work Plan and Associated Documents

To: "Tisa, Kimberly" <tisa.kimberly@epa.go>

Cc: "Doubleday, Edward" <EDoubleday@trcsolutions.com>, Daniel Stanton <dstanton@newmilford.org>, Michael Costello <mike@costellodismantling.com>

Hi Kim:

In addition to the submitted Sampling Plan, Costello has obtained the attached sample results as explained in their cover letter, also attached. We are submitting these results as additional data information for your file on this project, however the submission of these results does not change or alter the plan as already submitted on August 18, 2016.

Please let me know if you have any questions about this information.

Thank You,

Michael F. Zarba, P.E.

Public Works Director

Town of New Milford

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On Thu, Aug 18, 2016 at 4:35 PM, Daniel Stanton <dstanton@newmilford.org> wrote:

Dear Kim:

In accordance with item 11.b of the Approval letter dated September 1, 2015, your approval of the attached Costello and Select Demolition Work Plan is requested. This plan addresses all activities under the Approval Letter.

Should you have any questions or require additional information please feel free to contact me, or Ed Doubleday of TRC at [860 298-6245](tel:8602986245).

Thank You,

Daniel Stanton, PE

Town Engineer

----- Forwarded message -----

From: **Doubleday, Edward** <EDoubleday@trcsolutions.com>

Date: Tue, Aug 16, 2016 at 4:42 PM

Subject: Submittal of EPA Work Plan and Associated Documents

To: "Daniel Stanton (DStanton@newmilford.org)" <DStanton@newmilford.org>

Cc: "Kaczynski, Gregory" <GKaczynski@trcsolutions.com>, "Gille, Richard" <RGille@trcsolutions.com>, "Mike Zarba (mzarba@newmilford.org)" <mzarba@newmilford.org>

Dan --- Ed

3 of the 4 documents required for the EPA work plan submittal to Kim Tisa are ready for submittal and attached:

SIP Addendum prepared by TRC to incorporate transition joints

Costello/Select Demo EPA Work Plan

Figure 4 site plan , provided for information

The final document is the Sample Plan for Steel which should be available tomorrow. We reviewed the last draft and only had a few comments.

I would also suggest we include a copy of the Costello and Select Demo EPA certification letters if Mike hasn't already forwarded them.

I am sending these 3 today since they are large. Let me know if you have any problem receiving them and I can bring them on a Flash drive to the meeting tomorrow, if necessary.

Also, let me know if you need a template for the EPA submittal.

Ed

Edward C Doubleday
Senior Consultant/Project Manager

[cid:image003.jpg@01CE6756.CBE9AB20]

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Twitter<http://twitter.com/TRC_Companies> | www.trcsolutions.com<<http://www.trcsolutions.com/>>

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Daniel Stanton, PE, MASCE, CPII

Town Engineer

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